

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATIONAL ELECTRICAL
ANNUITY PLAN,

Plaintiff,

Case No. 18-13701

v.

Hon. Robert H. Cleland

HENKELS AND MCCOY, INC.,

Mag. Stephanie Dawkins Davis

Defendant.

PLAINTIFF'S FINAL WITNESS LIST

Plaintiff, through its attorneys, submits the following list of witnesses that it intends to call at trial of the above-captioned matter:

1. Dean Bradley, Business Manager, Local 17, IBEW.
2. Jeff Mitchell, Assistant Business Manager, Local 17, IBEW.
3. Kevin Shaffer, Former Business Manager, Local 17, IBEW.
4. Chad Clark, Business Manager, Local 876, IBEW

These witnesses will testify to introduce into evidence job referrals to defendant, the relevant collective bargaining agreements, contribution reports and the relevant trust documents; will describe the work performed by the defendant; and will discuss prior negotiations between these parties.

5. Charles D. Nichols, Auditor, Stefansky, Holloway & Nichols.

This witness will testify regarding his audit of the defendant's payroll and other records.

6. Jon C. Joynson

This witness will testify regarding the work defendant is currently performing for Verizon.

7. Keeper of the records of the plaintiff fund

To the extent necessary, this witness will testify to introduce regarding documents maintained by plaintiff in the regular course of business, including Trust Documents and contributions reports.

8. Keeper of the records of defendant.

To the extent necessary, this witness will testify to introduce regarding documents maintained by defendant in the regular course of business, including payroll records and contributions reports.

9. All witnesses listed in defendant's witness list.

Respectfully submitted,

WATKINS, PAWLICK, CALATI, & PRIFTI, PC

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